



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS/RMP
F. #2021R00600

271 Cadman Plaza East
Brooklyn, New York 11201

November 22, 2024

Kenneth Abell
Jarrod L. Schaeffer
Abell Eskew Landau LLP
256 Fifth Avenue, 5th Floor
New York, NY 10001

Seth DuCharme
Nicole Boeckmann
Bracewell LLP
31 W. 52nd Street, Suite 1900
New York, NY, 10019-6118

By Email and ECF

Re: United States v. Sun, et. al.
Criminal Docket No. 24-CR-346 (BMC)

Dear Counsel:

This letter will be accompanied by a link, sent by separate e-mail, to the secure download of certain discovery materials produced pursuant to Rule 16 of the Federal Rules of Criminal Procedure. The government renews its request for reciprocal discovery from the defendants.

The following documents were obtained by the government during the course of the investigation:

Bates No.	Description of Item
EDNY-017380-EDNY-022256	Records from American Express
EDNY-022257-EDNY-024806	Records from Bank of America

Bates No.	Description of Item
EDNY-024807-EDNY-025379	Records from Barclays Bank
EDNY-025301-EDNY-025579	Records from Capital One Bank
EDNY-025552-EDNY-025686	Records from Cathay Bank
EDNY-025682-EDNY-025696	Records from CHIPS
EDNY-025697-EDNY-032696	Records from Citibank
EDNY-032696-EDNY-032779	Records from Coinbase
EDNY-032767-EDNY-032776	Records from Deutsche Bank
EDNY-032771-EDNY-032896	Records from Equifax
EDNY-032895-EDNY-032979	Records from Experian
EDNY-032928-EDNY-032936	Records from Federal Reserve
EDNY-032930-EDNY-033036	Records from HSBC Bank
EDNY-033037-EDNY-033179	Records from JP Morgan Chase Bank
EDNY-033126-EDNY-035186	Records from Merrill Lynch
EDNY-035182-EDNY-035226	Records from PayPal
EDNY-035228-EDNY-035479	Records from Robinhood
EDNY-035492-EDNY-035479	Records from Standard Chartered Bank
EDNY-035493-EDNY-037826	Records from TD Bank
EDNY-037826-EDNY-037856	Records from Transunion
EDNY-037851-EDNY-037879	Records from Venmo
EDNY-037853-EDNY-037856	Records from Wells Fargo
EDNY-037856-EDNY-037875	Records from Zelle

In addition, please find the following materials produced in accordance with Rule 16 of the Federal Rules of Criminal Procedure, which are contained on encrypted hard drives produced separately to counsel for the respective defendant.

Bates No.	Description of Item
EDNY-037876	Responsive Report for [REDACTED] Gmail Account
EDNY-037877	Responsive Report for [REDACTED] Gmail Account
EDNY-037878	Responsive Report for an Electronic Device of the Person Identified in the Indictment as "Company-1 Owner"
EDNY-037879	Responsive Report for Chris Hu's iPhone 14 Pro Max
EDNY-037880	Responsive Report for Linda Sun's iPhone 14 Pro

You may examine the physical evidence discoverable under Rule 16, including original documents and items, by calling us to arrange a mutually convenient time.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Alexander A. Solomon
Alexander A. Solomon
Robert M. Pollack
Assistant U.S. Attorneys
(718) 254-7000

cc: Clerk of the Court (BMC) (by ECF) (without download link)